



MEMO ENDORSED

Steven W. Gold
Steven G. Mintz*
Jeffrey D. Pollack*
Elliot G. Sagor
Ira Lee Sorkin
Lon Jacobs
Steven A. Samide
Scott A. Klein
Terence W. McCormick***
Robert B. Lachenauer
Roger L. Stavis
Charles A. Ross**
Richard M. Breslow
Barry M. Kazan*
Craig D. Spector*
Kevin M. Brown
Alexander H. Gardner
Heath Loring

Peter Guirguis
Andrew R. Gottesman
Matthew S. Seminara
Julia B. Milne
James W. Kennedy
Ryan W. Lawler*
Andrew A. Smith
Amit Sondhi
Brett Joshpe
Michael Mooney
Adam K. Brody
Andrew E. Steckler
Alex J. Otchy*
Philip Tafet
Carli M. Aberle
Zachary J. Turquand
Kellyann T. Ryan
Sitie "Esther" Tang

*Also admitted in New Jersey
**Also admitted in Florida
***Also admitted in California

Senior Counsel
Jack A. Horn
Noreen E. Cosgrove
Timothy J. Quill, Jr.

Of Counsel
Honorable Vito J. Titone (*dec.*)
NY State Court of Appeals 1985-1998
Harvey J. Horowitz (*dec.*)
Honorable Howard Miller
NY Appellate Div. 1999-2010 [ret.]
Alan Katz
Eric M. Kutner
Andrew P. Napolitano°
Brian T. Sampson
Erica Nazarian
Tara Shamroth
Jared Van Vleet

°Admitted to practice only before all courts
in New Jersey and all Federal Courts in New York City

September 6, 2023

VIA ECF

Hon. Jessica G.L. Clarke
United States District Judge
Daniel Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Malvasio and Marcus
Docket Number 23 Cr. 396 (JGLC)

Your Honor:

We represent the defendant, GREGG MARCUS who was released on an Appearance Bond executed on August 10, 2023. In the Order Setting Conditions of Release, Mr. Marcus agreed to only travel to the Southern District of Florida and points in between for travel to other districts. We write to request an order of the Court permitting Mr. Marcus to travel to New Jersey from 9/16-9/18/23 and Nashville from 10/6-10/9/23 for his son's birthday and his partner's family wedding.

The specific travel details of the two trips are as follows:

NJ Trip:

Occasion: Family wedding

Flights:

- Leave on 9/16 from Fort Lauderdale (FLL) to EWR (JetBlue Flight #B6 306)
- Returning 9/18 from EWR to FLL (Jet Blue Flight # B6 305 to FLL)

Lodging: Courtyard by Marriott at 245 Half Mile Road, Red Bank NJ 07701



September 6, 2023
Page 2

Nashville Trip:

Occasion: son's 30th birthday

Flights:

- Leave on 10/6 from FLL to BNA /Nashville (Jet Blue Flight# B6 181)
- Return out on 10/9 from BNA Nashville to FLL (JetBlue FLT# B6 182 to FLL)

Lodging: JW Marriott 201 8TH Ave. Nashville

I received an email from Mr. Marcus' pretrial services officer, Nora Heredia Burgos, stating that the "USPO has no objection" to this request. I also received an email from AUSA Jaclyn Delligatti stating, "I defer to Pretrial Services' recommendation."

For the foregoing reasons, we respectfully request that the Court endorse this letter and grant Mr. Marcus' application to travel as set forth herein.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Alex M.".

Alexander Gardner

cc: All Counsel

Application is GRANTED. Defendant Gregg Marcus's conditions of bail are temporarily modified to permit travel to the District of New Jersey from September 16, 2023 through September 18, 2023 and to the Middle District of Tennessee from October 6, 2023 through October 9, 2023. All other conditions of bail shall remain in effect. Defendant shall provide his pretrial services officer with his itinerary. The Clerk of Court is respectfully directed to terminate the letter motion at ECF No. 23.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Jessica Clarke".

JESSICA G. L. CLARKE
United States District Judge

Dated: September 7, 2023
New York, New York